

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

ZUNUM AERO, INC.,

Plaintiff

v.

THE BOEING COMPANY; BOEING
HORIZONX VENTURES, LLC,

Defendants.

Case No. 2:21-cv-00896-JLR

**STIPULATION AND [PROPOSED]
ORDER ON SEALING**

NOTED ON MOTION CALENDAR:
July 5, 2024

Pursuant to this Court’s Minute Order dated June 25, 2024 (Dkt. 731, the “Minute Order”), Plaintiff Zunum Aero, Inc. (“Zunum”) and Defendants The Boeing Company and Boeing HorizonX Ventures, LLC (“Boeing”) (collectively, the “Parties”), hereby submit this Joint Stipulation and Proposed Order (“Stipulation”).

WHEREAS, pursuant to the Minute Order, the parties must file a joint stipulated motion and proposed order regarding sealing no later than 7/5/2024;

WHEREAS, the Parties have conferred regarding Zunum’s sealing requests in Dkt. # 697;

WHEREAS, the Parties have conferred as to whether the following documents should remain under seal, be filed in redacted form, or be unsealed;

WHEREAS, in entering this Stipulation, Boeing does not concede that, and at this time takes no position whether, the materials or information Zunum seeks to seal does, in fact, contain that Zunum's confidential information. Boeing expressly reserves the right to argue that any such material or information does not contain confidential information. Furthermore, the Parties expressly agree that they will not argue that positions taken in this Stipulation have any bearing on whether materials or information, do, in fact, contain any confidential information or trade secrets.

NOW, THEREFORE, the Parties respectfully propose that the following documents should remain under seal, be filed in redacted form, or be unsealed, as specified in the right-hand column below:

Docket 697: Zunum's Motion to Seal Exhibits Submitted with Zunum's Motion for Post-Trial Relief and Accompanying Declaration of Scott M. Danner			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 704] Declaration of Scott M. Danner	Redact	No position	N/A.
[Dkt. 704, Att. 2] Danner Declaration, Exhibit 2	Redact	No position	N/A.
[Dkt. 704, Att. 3] Danner Declaration, Exhibit 3	Redact	No position	N/A.
[Dkt. 704, Att. 4] Danner Declaration, Exhibit 4	Redact	No position	N/A.
[Dkt. 704, Att. 5] Danner Declaration, Exhibit 5	Redact	No position	N/A.
[Dkt. 704, Att. 6] Danner Declaration, Exhibit 6	Redact	No position	N/A.
[Dkt. 704, Att. 7] Danner Declaration, Exhibit 7	Redact	No position	N/A.
[Dkt. 704, Att. 8]	Redact	No position	N/A.

Docket 697: Zunum's Motion to Seal Exhibits Submitted with Zunum's Motion for Post-Trial Relief and Accompanying Declaration of Scott M. Danner			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
Danner Declaration, Exhibit 8			
[Dkt. 704, Att. 9] Danner Declaration, Exhibit 9	Redact	No position	N/A.
[Dkt. 704, Att. 10] Danner Declaration, Exhibit 10	Redact	No position	N/A.
[Dkt. 704, Att. 11] Danner Declaration, Exhibit 11	Redact	No position	N/A.
[Dkt. 704, Att. 12] Danner Declaration, Exhibit 12	Redact	No position	N/A.
[Dkt. 704, Att. 13] Danner Declaration, Exhibit 13	Redact	No position	N/A.
[Dkt. 704, Att. 14] Danner Declaration, Exhibit 14	Redact	No position	N/A.
[Dkt. 704, Att. 15] Danner Declaration, Exhibit 15	Redact	No position	N/A.
[Dkt. 704, Att. 16] Danner Declaration, Exhibit 16	Redact	No position	N/A.
[Dkt. 704, Att. 17] Danner Declaration, Exhibit 17	Redact	No position	N/A.
[Dkt. 704, Att. 18] Danner Declaration, Exhibit 18	Redact	No position	N/A.
[Dkt. 704, Att. 19] Danner Declaration, Exhibit 19	Redact	No position	N/A.
[Dkt. 704, Att. 20] Danner Declaration, Exhibit 20	Redact	No position	N/A.
[Dkt. 704, Att. 21] Danner Declaration, Exhibit 21	Redact	No position	N/A.

Docket 697: Zunum's Motion to Seal Exhibits Submitted with Zunum's Motion for Post-Trial Relief and Accompanying Declaration of Scott M. Danner

Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 704, Att. 22] Danner Declaration, Exhibit 22	Redact	No position	N/A.

Dated: July 3, 2024

By: /s/ Scott M. Danner

Scott M. Danner, NY Bar #4853016
(admitted *pro hac vice*)
Brian T. Goldman, NY Bar #5616891
(admitted *pro hac vice*)
Charlotte Baigent, NY Bar #5979224
(admitted *pro hac vice*)
**HOLWELL SHUSTER &
GOLDBERG LLP**
425 Lexington Avenue, 14th Floor
New York, New York 10017
Telephone: (646) 837-8530
sdanner@hsgllp.com
bgoldman@hsgllp.com
cbaigent@hsgllp.com

Steven W. Fogg
CORR CRONIN LLP
1015 Second Ave, 10th Floor
Seattle, WA 98104
(206) 625-8600
sfogg@corrchronin.com

Counsel for Plaintiff

By: /s/ Yegor Fursevich

John C. Hueston
(Admitted *Pro Hac Vice*)
Email: jhueston@hueston.com
Moez M. Kaba
(Admitted *Pro Hac Vice*)
Email: mkaba@hueston.com
Yegor Fursevich
(Admitted *Pro Hac Vice*)
Email: yfursevich@hueston.com
Justin M. Greer
(Admitted *Pro Hac Vice*)
Email: jgreer@hueston.com
Cassidy O'Sullivan
(Admitted *Pro Hac Vice*)
Email: cosullivan@huston.com
HUESTON HENNIGAN LLP
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340
Facsimile: (888) 866-4825

David A. Perez, WSBA No. 43959
Susan E. Foster WSBA No. 18030
Madeline D. Swan WSBA No. 56355
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101
(206) 359-8000
214-969-5100 (fax)
makairis@jonesday.com

Counsel for Defendants

[PROPOSED] ORDER

IT IS HEREBY ORDERED THAT, pursuant to the Parties' Stipulation, and for good cause and compelling reasons shown: Dkt. 704, Dkt. 704 Att. 2, Dkt. 704 Att. 3, Dkt. 704 Att. 4, Dkt. 704 Att. 5, Dkt. 704 Att. 6, Dkt. 704 Att. 7, Dkt. 704 Att. 8, Dkt. 704 Att. 9, Dkt. 704 Att. 10, Dkt. 704 Att. 11, Dkt. 704 Att. 12, Dkt. 704 Att. 13, Dkt. 704 Att. 14, Dkt. 704 Att. 15, Dkt. 704 Att. 16, Dkt. 704 Att. 17, Dkt. 704 Att. 18, Dkt. 704 Att. 19, Dkt. 704 Att. 20, Dkt. 704 Att. 21, and Dkt. 704 Att. 22 shall remain as redacted on the public docket; the sealed versions of the aforementioned documents—Dkts. 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, and 726—shall remain under seal.

The court DENIES Zunum's motion to seal (Dkt. # 697) as moot.

IT IS SO ORDERED.

DATED this 5th day of July, 2024.

A handwritten signature in black ink, appearing to read "James L. Robart", written over a horizontal line.

The Honorable James L. Robart
United States District Judge